

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

WINFIELD DAVID BARTLETT and LILA  
MAE BARTLETT,

) Case No. 2:15-cv-04289-MBS

Plaintiffs

)

v.

)

AIR & LIQUID SYSTEMS CORPORATION

**CONSENT STIPULATION  
OF DISMISSAL OF JOHN  
CRANE INC.**

Successor by Merger to Buffalo Pumps, Inc.

A Pennsylvania Corporation, et al.,

)

Defendants

)

)

COMES NOW Plaintiffs, Winfield David Bartlett, by and through undersigned counsel, and pursuant to Rule 41 moves to dismiss Plaintiffs' claims against John Crane Inc. with prejudice, each party to bear its own fees and costs. Plaintiffs expressly reserve their right to proceed against all other defendants as filed.

This 26<sup>th</sup> day of August, 2016.

WE SO CONSENT:

MOTLEY RICE LLP

WE SO CONSENT:

RICHARDSON, PLOWDEN & ROBINSON,  
P.A.

s/ W. Christopher Swett

W. Christopher Swett, Fed Bar Id. 11177  
Motley Rice, LLP  
P.O. Box 1792  
Mt. Pleasant, SC 29465

Attorneys for Plaintiffs

August 26, 2016

s/James H. Elliott, Jr.

James H. Elliott, Jr., Fed Bar Id. 7043  
Samia Hanafi Nettles, Fed Bar Id. 10278  
171 Church Street, Suite 150  
Charleston, SC 29401

Attorneys for John Crane, Inc.

August 26, 2016

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2016, the foregoing was electronically filed with the Clerk of Court using the CM-ECF system. Notification of such filing was given to the following by the CM-ECF system to those registered to receive a Notice of Electronic Filing for this case:

John E. Herrick, Esquire  
W. Christopher Swett, Esquire  
Benjamin D. Cunningham, Esquire  
Motley Rice LLP  
P.O. Box 1792  
Mt. Pleasant, SC 29465  
[jherrick@motleyrice.com](mailto:jherrick@motleyrice.com)  
[cswett@motleyrice.com](mailto:cswett@motleyrice.com)  
[bcunningham@motleyrice.com](mailto:bcunningham@motleyrice.com)  
*Attorney for Plaintiffs*

Defense Counsel of Record

s/James H. Elliott, Jr.  
James H. Elliott, Jr.